

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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UNITHAI MARITIME LIMITED,	:	
	:	
Plaintiff,	:	07 CV 5730 (BSJ)
	:	
v.	:	
	:	
RP LOGISTICS PVT. LTD. and	:	
R. PIYARELALL INTERNATIONAL	:	
PVT. LTD.	:	
Defendants.	:	
-----X		

**DECLARATION OF LAWRENCE G. COHEN IN SUPPORT OF PLAINTIFF'S
MOTION FOR LEAVE TO FILE AMENDED VERIFIED COMPLAINT**

Lawrence G. Cohen declares as follows:

1. I am a partner with the law firm of Vandeventer Black LLP, attorneys for the Plaintiff, as well as a member in good standing of the bars of New York and Virginia and admitted to practice in this Honorable Court.
2. I submit this Declaration in Support of Plaintiffs' Motion to Amend Verified Complaint against RP Logistics Pvt. Ltd. and R. Piyarelall International Pvt. Ltd. (collectively referred to as "Defendants"), filed on July 25, 2007, to which this Declaration is attached.
3. In accordance with Fed. R. Civ. P. 15(a), on July 19, 2007, counsel for the Plaintiff contacted counsel for the Defendants and requested consent to file an Amended Verified Complaint.
4. By return correspondence dated July 19, 2007, counsel for the Defendants herein indicated he would not consent to the filing of an Amended Verified Complaint.

5. In the interests of justice, Plaintiff respectfully requests it be permitted to correct the scrivener's contained in Paragraph 4 of the Verified Complaint. Paragraph 4 of the Verified Complaint incorrectly states that "Plaintiff was, at all relevant times, the demise owner of the vessel...." Due to a scrivener's error, Plaintiff actually intended Paragraph 4 of the Verified Complaint to read "Plaintiff was, at all relevant times, the disponent owner of the vessel..."

6. The filing of this Amended Verified Complaint will not cause prejudice to the Defendants, the Plaintiff has not acted in bad faith, and the amendment is not futile.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 25, 2007.

/S/Lawrence G. Cohen
Lawrence G. Cohen

AFFIRMATION OF SERVICE

I hereby certify that on July 25, 2007, a copy of the foregoing DECLARATION OF LAWRENCE G. COHEN IN SUPPORT OF PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED VERIFIED COMPLAINT was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.

By: /s/Lawrence G. Cohen
Lawrence G. Cohen